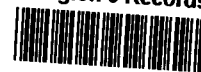


SAUGET AREA G, IL SITE  
ID = 05AV

SUPERFUND COOPERATIVE AGREEMENT (SCA)  
ILLINOIS EPA (#598201)

EPA Region 5 Records Ctr.



221470

SAUGET AREA G, SITE ID=054V

COST from 1/1/1994 - 6/30/2003

SUPERFUND COOPERATIVE AGREEMENT (SCA)

ILLINOIS EPA (#598201)

DATE: DRAWDOWN from 11/18/1994 to 11/20/1995

## Contract Costs

SAUGET AREA G, SAUGET, IL SITE ID = 05 4V

Site Costs from 1/1/1994 through 6/30/2003

SUPERFUND COOPERATIVE AGREEMENT (SCA)

State Agency: ILLINOIS E.P.A.

SCA Number: 598201

Project Officer(s):

Dates of Service: From: To:

Summary of Service:

Total Costs: \$21,955.00

Drawdown Number	Drawdown Date	Drawdown Amount	Treasury Schedule Number and Date		Site Amount
376002057A1	11/18/1994	1,365.00	1116940411	11/18/1994	211.00
376002057A1	01/13/1995	1,336.00	0112950429	01/13/1995	1,336.00
376002057A1	02/10/1995	1,578.00	0208950437	02/10/1995	1,578.00
376002057A1	03/27/1995	7,976.00	0322950449	03/27/1995	1,387.00
376002057A1	03/27/1995	0.00	1214940420	03/27/1995	341.00
376002057A1	04/17/1995	1,939.00	0414950457	04/17/1995	919.00
376002057A1	05/18/1995	3,876.00	0515950464	05/18/1995	2,126.00
376002057A1	06/16/1995	7,784.00	0613950473	06/16/1995	4,912.00
376002057A1	07/24/1995	4,210.00	0720950482	07/24/1995	3,425.00
376002057A1	08/29/1995	2,787.00	0828950490	08/29/1995	2,519.00
376002057A1	11/20/1995	3,201.00	1113950412	11/20/1995	3,201.00
Total:					<u>\$21,955.00</u>



State of Illinois  
**ENVIRONMENTAL PROTECTION AGENCY**

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/782-6760

March 29, 1994

CERTIFIED

P 036 052 169

V005594-01-46

Mr. Valdas V. Adamkus  
Regional Administrator  
U.S. Environmental Protection Agency  
Region V  
Mail Code 5RA-19  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**RECEIVED**  
APR 4 1994

PROGRAM MANAGEMENT  
& STATE RELATIONS SECTION

Refer to: LPC# 1630200005  
Grant # V005982  
Sauget Area 1 Sites  
Superfund Cooperative Agreement

Refer to: [REDACTED]

Dear Mr. Adamkus:

Enclosed are two (2) amendments, one for the RP Oversight Cooperative Agreement for the Ilada Energy Site and another to the Enforcement Management Cooperative Agreement for the addition of the Sauget Area 1 Sites. We are requesting an increase in the amount of [REDACTED] for the [REDACTED] Site and an increase in the amount of \$21,995 for the Sauget Area 1 Sites.

Included with these amendments are revised detailed budgets and scopes of work, breakdown by tasks and object class summaries.

If you have any questions please contact Tim Milbrandt at the above telephone number.

Respectfully,

*William C. Child*

William C. Child, Chief  
Bureau of Land

cc: John Oaks - USEPA

# APPLICATION FOR FEDERAL ASSISTANCE

CMS Approval No 0348-0

1. TYPE OF SUBMISSION: <input type="checkbox"/> Application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		2. DATE RECEIVED BY STATE		3. DATE RECEIVED BY FEDERAL AGENCY	
4. DATE SUBMITTED		APPLICANT IDENTIFIER Enforcement Mgmt. Assistance		STATE APPLICATION IDENTIFIER	
5. APPLICANT INFORMATION		6. DATE RECEIVED BY STATE		7. FEDERAL IDENTIFIER V005982	
8. APPLICANT NAME ILLINOIS ENVIRONMENTAL PROTECTION AGENCY		9. ORGANIZATIONAL UNIT BUREAU OF LAND		10. ADDRESS (give city, county, state and zip code) P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 SANGAMON COUNTY	
11. EMPLOYER IDENTIFICATION NUMBER (EIN): 37 - 6002057		12. TYPE OF APPLICANT: (enter appropriate letter in box) <b>A</b> A State B County C Municipal D Township E Interstate F Intermunicipal G Special District H Independent School Dist. I State Controlled Institution of Higher Learning J Private University K Indian Tribe L Individual M Profit Organization N Other (Specify)		13. NAME OF FEDERAL AGENCY: U.S.EPA, REGION V	
14. TYPE OF APPLICATION: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input checked="" type="checkbox"/> Revision (Revision enter appropriate letter(s) in box(es)) <b>A</b> <input type="checkbox"/> A Increase Award B Decrease Award C Increase Duration D Decrease Duration Other (Specify):		15. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 66-806		16. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Addition of new site to the enforcement management cooperative agreement. Additional funds required are 21,955.	
17. AREAS AFFECTED BY PROJECT (cities, counties, states, etc.) STATE OF ILLINOIS		18. PROPOSED PROJECT Start Date: Ending Date: a. Applicant: ILLINOIS b. Project: STATEWIDE		19. ESTIMATED FUNDING: a. Federal: \$ 21,955.00 b. Applicant: \$ .00 c. State: \$ .00 d. Local: \$ .00 e. Other: \$ .00 f. Program Income: \$ .00 g. TOTAL: \$ 21,955.00	
20. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN FULLY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED		21. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? a. YES THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE March 10, 1994 b. NO <input type="checkbox"/> PROGRAM IS NOT COVERED BY E.O. 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW		22. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? <input type="checkbox"/> Yes If "Yes," attach an explanation. <input type="checkbox"/> No	
23. TYPED NAME OF AUTHORIZED REPRESENTATIVE MARY A. GADE		24. TITLE DIRECTOR		25. TELEPHONE NUMBER 217/792-3397	
26. SIGNATURE OF AUTHORIZED REPRESENTATIVE <i>Mary A. Gade</i>		27. DATE SIGNED 3/28/94		28. PREVIOUS EDITIONS TO BE DESTROYED	

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Standard Form 424 Rev  
Prescribed by GAO

Printed on Recycled Paper

# BUDGET INFORMATION — — — Non Construction Programs

## SECTION A — BUDGET SUMMARY

Grant program function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non Federal (d)	Federal (e)	Non Federal (f)	Total (g)
1. Sauget Area 1 Sites	66-802	\$ 0	\$ 0	\$ 21,955	\$ 0	\$ 21,955
2.						0
3.						0
						0
5. TOTALS		\$ 0	\$ 0	\$ 21,955	\$ 0	\$ 21,955

## SECTION B — BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, Function or Activity				Total (5)
	(1) Hada Energy Site	(2)	(3)	(4)	
a. Personnel	\$ 9,938				\$ 9,938
b. Fringe Benefits	2,896				2,896
c. Travel	3,465				3,465
d. Equipment	0				0
e. Supplies	100				100
f. Contractual	150				150
g. Construction	0				0
h. Other	0				0
i. Total Direct Charges (sum of 6a - 6h)	16,549	0	0	0	16,549
j. Indirect Charges	5,406				5,406
k. TOTALS (sum of 6i - 6j)	\$ 21,955	\$ 0	\$ 0	\$ 0	\$ 21,955
7. Program income					

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### SECTION C - NON FEDERAL RESOURCES

	(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8. Saugnet Area 1 Sites		0	0	0	0
9.					0
10.					0
11.					0
12. TOTALS	(Sum of lines 8 and 11)	0	0	0	0

### SECTION D - FORECASTED CASH NEEDS

	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ 21,955	\$ 5,489	\$ 5,489	\$ 5,489	\$ 5,488
14. Non/Federal		0	0	0	0
15. TOTAL	(Sum of lines 13 and 14)	5,489	5,489	5,489	5,488

### SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT

(a) Grant Program	FUTURE FUNDING PERIODS (Year)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16.				
17.				
18.				
19.				
20. TOTALS	(Sum of lines 16 and 19)	0	0	0

### SECTION F - OTHER BUDGET INFORMATION

(Attach additional Sheets if Necessary)

21. Direct Charges:	22. Indirect Charges	SEE ATTACHED
23. Remarks		

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## INSTRUCTIONS FOR THE SF-424A

### General Instructions

This form is designed so that application can be made for funds from one or more grant programs. In preparing the budget, adhere to any existing Federal grantor agency guidelines which prescribe how and whether budgeted amounts should be separately shown for different functions or activities within the program. For some programs, grantor agencies may require budgets to be separately shown by function or activity. For other programs, grantor agencies may require a breakdown by function or activity. Sections A, B, C, and D should include budget estimates for the whole project except when applying for assistance which requires Federal authorization in annual or other funding period increments. In the latter case, Sections A, B, C, and D should provide the budget for the first budget period (usually a year) and Section E should present the need for Federal assistance in the subsequent budget periods. All applications should contain a breakdown by the object class categories shown in Lines a-k of Section B.

### Section A. Budget Summary Lines 1-4, Columns (a) and (b)

For applications pertaining to a *single* Federal grant program (Federal Domestic Assistance Catalog number) and *not requiring* a functional or activity breakdown, enter on Line 1 under Column (a) the catalog program title and the catalog number in Column (b).

For applications pertaining to a *single* program *requiring* budget amounts by multiple functions or activities, enter the name of each activity or function on each line in Column (a), and enter the catalog number in Column (b). For applications pertaining to multiple programs where none of the programs require a breakdown by function or activity, enter the catalog program title on each line in Column (a) and the respective catalog number on each line in Column (b).

For applications pertaining to *multiple* programs where one or more programs *require* a breakdown by function or activity, prepare a separate sheet for each program requiring the breakdown. Additional sheets should be used when one form does not provide adequate space for all breakdown of data required. However, when more than one sheet is used, the first page should provide the summary totals by programs.

### Lines 1-4, Columns (c) through (g.)

For *new applications*, leave Columns (c) and (d) blank. For each line entry in Columns (a) and (b), enter in Columns (e), (f), and (g) the appropriate amounts of funds needed to support the project for the first funding period (usually a year).

### Lines 1-4, Columns (c) through (g.) (continued)

For *continuing grant program applications*, submit these forms before the end of each funding period as required by the grantor agency. Enter in Columns (c) and (d) the estimated amounts of funds which will remain unobligated at the end of the grant funding period only if the Federal grantor agency instructions provide for this. Otherwise, leave these columns blank. Enter in columns (e) and (f) the amounts of funds needed for the upcoming period. The amount(s) in Column (g) should be the sum of amounts in Columns (e) and (f).

For *supplemental grants and changes* to existing grants, do not use Columns (c) and (d). Enter in Column (e) the amount of the increase or decrease of Federal funds and enter in Column (f) the amount of the increase or decrease of non-Federal funds. In Column (g) enter the new total budgeted amount (Federal and non-Federal) which includes the total previous authorized budgeted amounts plus or minus, as appropriate, the amounts shown in Columns (e) and (f). The amount(s) in Column (g) should not equal the sum of amounts in Columns (e) and (f).

Line 5 — Show the totals for all columns used.

### Section B Budget Categories

In the column headings (1) through (4), enter the titles of the same programs, functions, and activities shown on Lines 1-4, Column (a), Section A. When additional sheets are prepared for Section A, provide similar column headings on each sheet. For each program, function or activity, fill in the total requirements for funds (both Federal and non-Federal) by object class categories.

Lines 6a-i — Show the totals of Lines 6a to 6h in each column.

Line 6j — Show the amount of indirect cost.

Line 6k — Enter the total of amounts on Lines 6i and 6j. For all applications for new grants and continuation grants the total amount in column (5), Line 6k, should be the same as the total amount shown in Section A, Column (g), Line 5. For supplemental grants and changes to grants, the total amount of the increase or decrease as shown in Columns (1)-(4), Line 6k should be the same as the sum of the amounts in Section A, Columns (e) and (f) on Line 5.



**ASSURANCES — NON-CONSTRUCTION PROGRAMS**






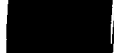

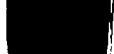



**Note:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States, and if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§ 4728-4763) relating to prescribed standards for merit systems for programs funded under one of the nineteen statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§ 1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§ 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. § 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made, and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply with the provisions of the Hatch Act (5 U.S.C. §§ 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§ 276a to 276a-7), the Copeland Act (40 U.S.C. § 276c and 18 U.S.C. §§ 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 327-333), regarding labor standards for federally assisted construction subagreements.

**SAUGET AREA 1 SITES  
ENFORCEMENT ASSISTANCE  
OBJECT CLASS CATEGORIES SUMMARY**

**PERSONAL SERVICES**

Position	Title	Annual Salary x	Work Year	=	Cost Nearest \$
	ENVIR. PROT. ENGR. VI				657
	ENVIR. PROT. ENGR. V				1,233
	TECH. ADVISOR III				1,048
	ENVIR. PROT. ENGR. III				5,922
	ENVIR. PROT. SPEC. IV				1,078
TOTAL PERSONAL SERVICES					9,938

**FRINGE BENEFITS:**

SOCIAL SECURITY				760
RETIREMENT				616
GROUP INSURANCE				1,122
RETIREMENT PICKUP				398



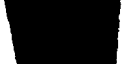

**TOTAL FRINGE BENEFITS**

2,896

**TRAVEL**

	CHICAGO TRIPS	SITE DAY TRIPS	WEEK TRIPS
SENIOR SUPERVISOR	1	1	0
FIRST LINE SUPERVISOR	2	1	0
PROJECT MANAGER	5	5	0
COMM. RELATION OFF.	1	2	0
TOTAL	9	9	0

SPRINGFIELD/CHICAGO  
TRANSPORTATION TO CHICAGO  
LODGING  
PER DIEM

	9	
	9	
	9	

SPRINGFIELD/SITE (DAY TRIP)  
TRANSPORTATION TO SITE  
LODGING  
PER DIEM

	9
	9
	9

**TOTAL TRAVEL**

3,465

EQUIPMENT		0
SUPPLIES (Tyvek, Booties)		100
CONTRACTUAL (Federal Express)		150
OTHER		
CONSTRUCTION		0
TOTAL DIRECT CHARGES		16,549
INDIRECT CHARGES		
Sum of Personnel Service Charges X Fring Benefits X .4212		5,406
TOTAL INDIRECT		5,406
TOTAL		21,955

**SAUGET AREA 1 SITES  
ENFORCEMENT ASSISTANCE  
BUDGET**

	CURRENT APPROVED BUDGET	CHANGE REQUESTED BUDGET	NEW OR REVISED BUDGET
PERSONNEL			
FRINGE BENEFITS			
TRAVEL			
EQUIPMENT			
SUPPLIES			
CONTRACTUAL			
CONSTRUCTION			
OTHER			
TOTAL DIRECT			
INDIRECT			69,001
TOTAL	224,358	21,955	246,313

*SAUGET AREA 1 SITES*  
*Cost per Task*

1. Review of existing information	\$4,391
2. Issuance and review of 104(e) letters	\$4,391
3. Issuance of Special Notice Letters	\$1,098
4. Preparation for PRP negotiations	\$4,830
5. Negotiations with PRPs to initiate RI/FS	\$4,830
6. Community Relations	<u>\$2,415</u>
TOTAL	21,955

SAUGET AREA 1 SITES  
ENFORCEMENT ASSISTANCE COOPERATIVE AGREEMENT

PURPOSE

The purpose of this Cooperative Agreement (CA) is to provide enforcement assistance to USEPA during the PRP identification/notification process and negotiation period that will follow. USEPA has agreed to accept the lead role in enforcement activities that will continue over the life of this CA.

IEPA has designated the following individual as the State Project Manager for the proposed Sauget Area 1 Sites NPL site:

Paul E. Takács, Project Manager  
Federal Sites Management Unit  
Division of Remediation Management  
Bureau of Land  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62794-9276 217/785-3912

The work tasks to be performed under this CA are listed below:

A. Review of Existing Information

A complete and thorough review of IEPA division files will be performed. All IEPA file material including PRP documentation, historical title search data and information request responses from PRPs IEPA had identified in a 1989 State enforcement action will be researched and presented to USEPA.

B. Issuance and Review of 104(e) Information Request Letters

Information Request Letters will be prepared by the USEPA and PRP responses to these letters will be directed to USEPA. IEPA will assist in the preparation of the information request letters as well as the review of the PRP responses to the extent practicable. USEPA will be supplied with a list of names and addresses of the PRPs IEPA identified in 1989 in the order of owners, operators and generators or a combination of the three. IEPA understands that there are a series of standardized questions within these letters associated with owners, operators and generators and if requested, IEPA will also supply USEPA with specific questions that pertain to particulars of the site that may not be covered in the standardized questions.

1. Review of Information Request Letters and identification of additional PRPs

The responses from the information request letters will be reviewed by IEPA. IEPA will provide input as to whether PRP responses may appear to be insufficient or incorrect. USEPA may elect to issue additional letters to the PRPs stating such deficiencies and delinquencies. Based on information obtained in the 104(e) responses, IEPA may also recommend to USEPA that additional parties associated with this site be identified as PRPs.

2. Issue additional 104(e) letters (if necessary)

USEPA may issue subsequent rounds of 104(e) letters based on information obtained in the initial round of 104(e) letters. With the review of the second and subsequent rounds of 104(e) responses, IEPA will again provide input as to whether or not PRP responses appear to be insufficient or incorrect and may also recommend that additional parties be identified as PRPs. This process will continue on an on-going basis until it has reasonably been determined impractical by USEPA.

#### C. Issuance of Special Notice Letters

To the best of IEPA's ability, IEPA will evaluate and research all materials compiled as a result of tasks A and B and assist USEPA in generating a PRP list for the issuance of Special Notice Letters. It will be the sole responsibility of USEPA to draft the Special Notice Letters.

#### D. Preparation for PRP Negotiations

This task will involve major discussions regarding the responses to the 104(e) letters, Special Notice Letters and other documents relevant to the site. Information within these responses and documents may be used by USEPA for establishing negotiations with identified PRPs. This task may include but is not limited to:

1. Analyzing information provided by PRPs in response to Special Notice Letters. IEPA will review the responses for completeness and deficiencies. Information derived from this analysis will be submitted to USEPA prior to the start of negotiations with PRPs identified from Special Notice Letters.
2. Assisting USEPA in constructing other relevant information to help in organizing PRPs and preparing for USEPA negotiations with identified PRPs. This preparation would include reviewing relevant and applicable USEPA policies and guidance documents relative to the RI/FS negotiation process.

### E. Negotiations with PRPs to Initiate an RI/FS

This task will involve detailed negotiations with identified and participating PRPs. During negotiations with PRPs, the following tasks may be performed and discussed but are not limited to:

1. Discussing information provided by the PRPs in response to the 104(e) letters and Special Notice Letters.
2. Discussing applicable policies and guidance documents.
3. Analyzing, reviewing and providing comments on samples, studies, and other scientific data that IEPA has performed.
4. Assessing current site conditions.
5. Participating in a negotiating team under an advisory role.
6. Performing file research to support negotiation efforts.
7. Reviewing PRP proposals and counter-proposals.
8. Providing advice on strengths and weaknesses of USEPA and PRP positions.
9. Analyzing proposed settlement alternatives.

### F. Community Relations Support

Since initial enforcement efforts will be headed up by USEPA, it is appropriate that USEPA coordinate community relations activities associated with these enforcement efforts. Typical community relations activities may include site visits by USEPA community relations personnel and the preparation of fact sheets/press releases associated with enforcement efforts. IEPA community relations personnel will, at minimum, assist USEPA counterparts in gaining familiarity with the site as well as review and comment on draft fact sheets and draft press releases prepared by USEPA.

### SCHEDULE OF TASKS

This schedule has been set up to match the work tasks described in this agreement. The tasks for actual work to be performed are mostly covered in Tasks A through F and are described below:

	<u>START</u>	<u>FINISH</u>
1) <u>Task A (Review of existing information</u>		
* File review, etc.	1/15/94	3/15/94



	<u>START</u>	<u>FINISH</u>
2) <u>Task B (Issuance and review of 104(e) letters)</u>		
* USEPA issue additional 104(e)s, if applicable and review responses.	3/16/94	continual process
3) <u>Task C (Issuance of Special Notice Letters)</u>		
* Special Notice mailing date.	9/15/94	
* Receiving possible Good Faith Proposal. (60 days)	9/16/94	11/15/94
4) <u>Task D (Preparation for PRP negotiations)</u>		
	6/15/94	continual process
5) <u>Task E (Negotiations with PRPs to initiate RI/FS)</u>		
* (If Good Faith Proposal is received by 11/15/94, extension for negotiations - 30 days)	9/16/94	12/15/94
6) <u>Task F (Community relations support)</u>		
	1/15/94	continual process

Approximate Cost Estimation of Each Task By Percentage of CA

1) Task A	-----	20% of CA
2) Task B	-----	20% of CA
3) Task C	-----	5% of CA
4) Task D	-----	22% of CA
5) Task E	-----	22% of CA
6) Task F	-----	11% of CA

OCT 04 1994.

RA-19J

Mary A. Gade, Director  
Illinois Environmental Protection Agency  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Dear Ms. Gade:

I have reviewed your application of March 29, 1994, requesting an amendment to Cooperative Agreement (CA) No. V005982-01 to add \$21,955 for your Agency to provide Support Agency Services for the Sauget Area 1 Site. The enclosed CA amendment confirms my approval of your request.

Please sign, date and return the original and two copies of this amendment to the Contracts and Grants Branch within 21 days of receipt of this letter.

Thank you for your continued participation in the Superfund Program.

Sincerely yours,

/s/ Original signed by  
ROBERT SPRINGER

Valdas V. Adamkus  
Regional Administrator

Enclosure

*RS for VVA*  
*9/28*

*WEN*  
*9/15/94*

*SPMB*  
*14 Sep 94*  
*BJK*  
*9/13/94*

*1/11/94*

*920*  
*9-02-94*  
*11/1*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

SEP 15 1994

SUBJECT: ACTION MEMORANDUM: Request for Enforcement Support  
Funds for the Illinois Environmental Protection Agency  
for activities at the Sauget Area 1 site

FROM: William E. Muno, Director  
Waste Management Division

TO: Valdas V. Adamkus  
Regional Administrator

PURPOSE

The purpose of this action memo is to request authorization to provide funding to the Illinois Environmental Protection Agency (IEPA), for enforcement support activities at the Sauget Area 1 site in Sauget, Illinois. IEPA will provide support by assisting U.S. EPA with review of existing enforcement files to aid in identifying potentially responsible parties (PRPs), to whom 104E Information Request letters will be mailed by U.S. EPA, reviewing 104E responses from PRPs in an effort to assist U.S. EPA in determining which respondents should receive special notice letters, assisting U.S. EPA in negotiations with PRPs and will provide community relations support.

IEPA has requested that funding in the amount of \$21,955 be added to Cooperative Agreement No. V005982-01 to finance these support activities.

BACKGROUND

The Sauget Area 1 Site is located in Sauget, Cahokia County, Illinois. Sources at the site include portions of Dead Creek, as well as low lying areas in the vicinity used for waste disposal. The site is contaminated with various chlorinated solvents, dichlorobenzene compounds, polychlorinated biphenyls (PCB), polyaromatic hydrocarbons (PAH) and heavy metals. These and other hazardous wastes were disposed of at the site for decades.

RECOMMENDATION

This request has been coordinated with the appropriate State and Region 5 personnel, and the costs have been determined to be reasonable. I recommend that you authorize the funding of this amendment in the amount of \$21,955, which is available in the Region 5 Enforcement Case Budget.

We have reviewed U.S. EPA Order 5700.1, entitled "Policy for Distinguishing Between Assistance and Acquisition," and have determined that the appropriate assistance instrument is a Cooperative Agreement amendment.

Attached for your signature is the CA amendment which will obligate the funds for this project, and a transmittal letter making the award offer. I am available to discuss this request in more detail at your convenience.

*[Handwritten signatures and dates]*  
SPMB 14 Sep 94  
JAO 9/15/94  
JAO 9/08/94  
9/13/94  
9/19/94

<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b>				<b>1. ASSISTANCE ID NO.</b> V 005982-01-G		<b>2. LOG NUMBER</b> 05-V -	
<b>EPA ASSISTANCE AGREEMENT / AMENDMENT</b>				<b>3. DATE OF AWARD</b> SEP 27 1994		<b>4. MAILING DATE</b> OCT 04 1994	
<b>PART I - ASSISTANCE NOTIFICATION INFORMATION</b>							
<b>5. AGREEMENT TYPE</b>				<b>6. PAYMENT METHOD</b>			
<input type="checkbox"/> Cooperative Agreement <input type="checkbox"/> Grant Agreement <input checked="" type="checkbox"/> Assistance Amendment				<input type="checkbox"/> Advance <input type="checkbox"/> Reimbursement <input checked="" type="checkbox"/> ACH Number <b>ACH-0504</b> Send Payment Request to: <b>COMPTROLLER BRANCH, MF-10J</b>			
<b>7. TYPE OF ACTION</b> INCREASE REVISION							
<b>R E C I P I E N T  O R G  E P A  C O N T A C T</b>	<b>8. RECIPIENT</b> ILLINOIS EPA 2200 CHURCHILL ROAD SPRINGFIELD, IL 62706			<b>9. PAYEE</b> ILLINOIS EPA 2200 CHURCHILL ROAD SPRINGFIELD, IL 62706			
	<b>EIN NO.</b> 376002057		<b>CONGRESSIONAL DISTRICT</b> 20		<b>10. RECIPIENT TYPE</b> STATE, COMMONWEALTH, TER		
	<b>11. PROJECT MANAGER AND TELEPHONE NO.</b> JOHN STELLER (217) 782-6760			<b>12. CONSULTANT</b> (WWT Construction Grants only)  N/A			
	<b>13. ISSUING OFFICE (CITY / STATE)</b> US ENVIRONMENTAL PROTECTION AGENCY CONTRACTS AND GRANTS BRANCH US EPA, REGION 5, MC-10J 77 W JACKSON BLVD CHICAGO, IL 60604-3590			<b>14. EPA PROJECT / STATE OFFICER AND TELEPHONE NO.</b> OAKS WASTE MANAGEMENT DIVISION HS-6J, (312) 886-6040			
<b>15. EPA CONGRESSIONAL LIAISON &amp; PHONE</b> BARBARA BROOKS, (202) 260-5660			<b>16. STATE APPL ID</b> (Clearinghouse)		<b>17. SCIENCE FIELD</b>		<b>18. PROJECT STEP</b> (WWT Construction Grants Only) N/A
<b>19. STATUTORY AUTHORITY</b> CERCLA: SEC. 104			<b>20. REGULATORY AUTHORITY</b> 40 CFR PTS 31, 35 SUBPT O		<b>21. STEP 2 + 3 &amp; STEP 3</b> (WWT Construction Grants Only)		
					a. Treatment Level b. Project Type c. Treatment Process d. Studies Design		
<b>22. PROJECT TITLE AND DESCRIPTION</b> ADDITION OF NEW SITE SAUGET AREA 1 TO THE ENFORCEMENT MANAGEMENT COOPERATIVE AGREEMENT							
<b>23. PROJECT LOCATION</b> (Areas Impacted by Project)							
<b>City / Place</b> STATEWIDE			<b>County</b> MULTI		<b>State</b> IL		<b>Congressional District</b> MULTI
<b>24. ASSISTANCE PROGRAM</b> (CFDA Program No. & Title) 66.802 Hazardous Substances Response Trust Fund				<b>25. PROJECT PERIOD</b> 09/15/87 - 09/30/95		<b>26. BUDGET PERIOD</b> 09/15/87 - 09/30/95	
<b>27. COMMUNITY POPULATION</b> (WWT Construction Grants Only) N/A			<b>28. TOTAL BUDGET PERIOD COST</b> \$246,313			<b>29. TOTAL PROJECT PERIOD COST</b> \$246,313	
<b>FUNDS</b>		<b>FORMER AWARD</b>		<b>THIS ACTION</b>		<b>AMENDED TOTAL</b>	
30. EPA Amount This Action		\$224,358		\$21,955		\$246,313	
31. EPA In-Kind Amount		0		0		0	
32. Unexpended Prior Year Balance		0		0		0	
33. Other Federal Funds		0		0		0	
34. Recipient Contribution		0		0		0	
35. State Contribution		0		0		0	
36. Local Contribution		0		0		0	
37. Other Contribution		0		0		0	
38. Allowable Project Cost		\$224,358		\$21,955		\$246,313	
<b>F I S C A L</b>	<b>Program Element</b>	<b>FY</b>	<b>Appropriation</b>	<b>Doc. Control No.</b>	<b>Account Number</b>	<b>Object Class</b>	<b>Obligation / Deobligation</b>
	(See continuation page)						



## PART II - APPROVED BUDGET

SITE NAME: SUMMARY BUDGET

ASSISTANCE IDENTIFICATION: V 005962-01-G

Page 3 of 5

TABLE A - OBJECT CLASS CATEGORY (Non-construction)		TOTAL APPROVED ALLOWABLE BUDGET PERIOD COST
1. PERSONNEL		\$115,586
2. FRINGE BENEFITS		21,984
3. TRAVEL		27,498
4. EQUIPMENT		0
5. SUPPLIES		1,571
6. CONTRACTUAL		5,266
7. CONSTRUCTION		0
8. OTHER		5,407
9. TOTAL DIRECT CHARGES		\$177,312
10. INDIRECT COSTS: RATE 42.12 % BASE S + FB		69,001
11. TOTAL (Share: Recipient 0.00 % Federal 100.00 %)		\$246,313
12. TOTAL APPROVED ASSISTANCE AMOUNT		\$246,313

TABLE B - PROGRAM ELEMENT CLASSIFICATION (Non-construction)	
1.	
2.	
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10.	
11.	
12. TOTAL (Share: Recipient _____ % Federal _____ %)	
13. TOTAL APPROVED ASSISTANCE AMOUNT	

TABLE C - PROGRAM ELEMENT CLASSIFICATION (Construction)	
1. ADMINISTRATION EXPENSE	
2. PRELIMINARY EXPENSE	
3. LAND STRUCTURES, RIGHT-OF-WAY	
4. ARCHITECTURAL ENGINEERING BASIC FEES	
5. OTHER ARCHITECTURAL ENGINEERING FEES	
6. PROJECT INSPECTION FEES	
7. LAND DEVELOPMENT	
8. RELOCATION EXPENSE	
9. RELOCATION PAYMENTS TO INDIVIDUALS AND BUSINESS	
10. DEMOLITION AND REMOVAL	
11. CONSTRUCTION AND PROJECT IMPROVEMENT	
12. EQUIPMENT	
13. MISCELLANEOUS	
14. TOTAL (Lines 1 thru 13)	
15. ESTIMATED INCOME (if applicable)	
16. NET PROJECT AMOUNT (Line 14 minus 15)	
17. LESS: INELIGIBLE EXCLUSIONS	
18. ADD: CONTINGENCIES	
19. TOTAL (Share: Recipient _____ % Federal _____ %)	
20. TOTAL APPROVED ASSISTANCE AMOUNT	

## PART II - APPROVED BUDGET

SITE NAME: SAUGET AREA 1 10/1/94-9/30/

ASSISTANCE IDENTIFICATION: V 005982-01-Q

Page 4 of 5

TABLE A - OBJECT CLASS CATEGORY (Non-construction)	TOTAL APPROVED ALLOWABLE BUDGET PERIOD COST
1. PERSONNEL	\$9,938
2. FRINGE BENEFITS	2,896
3. TRAVEL	3,465
4. EQUIPMENT	0
5. SUPPLIES	100
6. CONTRACTUAL	150
7. CONSTRUCTION	0
8. OTHER	0
9. TOTAL DIRECT CHARGES	\$16,549
10. INDIRECT COSTS: RATE 42.12 % BASE S + FB	5,406
11. TOTAL (Share: Recipient 0.00 % Federal 100.00 %)	\$21,955
12. TOTAL APPROVED ASSISTANCE AMOUNT	\$21,955

TABLE B - PROGRAM ELEMENT CLASSIFICATION (Non-construction)	
1.	
2.	
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8.	
9.	
10.	
11.	
12. TOTAL (Share: Recipient _____ % Federal _____ %)	
13. TOTAL APPROVED ASSISTANCE AMOUNT	

TABLE C - PROGRAM ELEMENT CLASSIFICATION (Construction)	
1. ADMINISTRATION EXPENSE	
2. PRELIMINARY EXPENSE	
3. LAND STRUCTURES, RIGHT-OF-WAY	
4. ARCHITECTURAL ENGINEERING BASIC FEES	
5. OTHER ARCHITECTURAL ENGINEERING FEES	
6. PROJECT INSPECTION FEES	
7. LAND DEVELOPMENT	
8. RELOCATION EXPENSE	
9. RELOCATION PAYMENTS TO INDIVIDUALS AND BUSINESS	
10. DEMOLITION AND REMOVAL	
11. CONSTRUCTION AND PROJECT IMPROVEMENT	
12. EQUIPMENT	
13. MISCELLANEOUS	
14. TOTAL (Lines 1 thru 13)	
15. ESTIMATED INCOME (if applicable)	
16. NET PROJECT AMOUNT (Line 14 minus 15)	
17. LESS: INELIGIBLE EXCLUSIONS	
18. ADD: CONTINGENCIES	
19. TOTAL (Share: Recipient _____ % Federal _____ %)	
20. TOTAL APPROVED ASSISTANCE AMOUNT	



## SPECIAL CONDITIONS (continued)

## TERMS AND CONDITIONS

1. ALL PREVIOUSLY CITED TERMS AND CONDITIONS REMAIN THE SAME.

## PART IV

**NOTE:** The Agreement must be completed in duplicate and the Original returned to the Grants Administration Division for Headquarters awards and to the appropriate Grants Administration Office for State and local awards within 3 calendar weeks after receipt or within any extension of time as may be granted by EPA.

Receipt of a written refusal or failure to return the properly executed document within the prescribed time, may result in the withdrawal of the offer by the Agency. Any change to the Agreement by the recipient subsequent to the document being signed by the EPA Award Official, which the Award Official determines to materially alter the Agreement, shall void the Agreement.

## OFFER AND ACCEPTANCE

The United States of America, acting by and through the U.S. Environmental Protection Agency (EPA), hereby offers assistance/amendment to the ILLINOIS EPA for 100.00 % of all approved costs incurred up to and not exceeding \$ 246,313 for the support of approved budget period effort described in application (including all application modifications) cited in item 22 of this Agreement

3/28/94 ADDITION OF NEW SITE TO ENFORCEMENT MANAGEMENT, included herein by reference.

RECIPIENT ORGANIZATION  
ASSISTANCE AMOUNT  
DATE AND TITLE

## ISSUING OFFICE (Grants Administration Office)

## ORGANIZATION / ADDRESS

CONTRACTS AND GRANTS BRANCH  
US EPA, REGION 5, MC-10J  
77 W JACKSON BLVD  
CHICAGO, IL 60604-3590

## AWARD APPROVAL OFFICE

## ORGANIZATION / ADDRESS

REGIONAL ADMINISTRATOR  
US EPA, REGION 5, R-19J  
77 W JACKSON BLVD  
CHICAGO, IL 60604-3590

## THE UNITED STATES OF AMERICA BY THE U.S ENVIRONMENTAL PROTECTION AGENCY

## SIGNATURE OF AWARD OFFICIAL

## TYPED NAME AND TITLE

VALDAS V. ADAMKUS

DATE  
SEP 27 1994

REGIONAL ADMINISTRATOR, REGION 5

This agreement is subject to applicable U.S. Environmental Protection Agency statutory provisions and assistance regulations. In accepting this award or amendment and any payments made pursuant thereto, (1) the undersigned represents that he is duly authorized to act on behalf of the recipient organization, and (2) the recipient agrees (a) that the award is subject to the applicable provisions of 40 CFR Chapter I, Subchapter B and of the provisions of this agreement (Parts I thru IV), and (b) that acceptance of any payments constitutes an agreement by the payee that the amounts, if any found by EPA to have been overpaid will be refunded or credited in full to EPA.

## BY AND ON BEHALF OF THE DESIGNATED RECIPIENT ORGANIZATION

## SIGNATURE

## TYPED NAME AND TITLE

Mary A. Gade, Director

## DATE

6/13/94



State of Illinois  
**ENVIRONMENTAL PROTECTION AGENCY**

Mary A. Gade, Director  
217/785-8604

2200 Churchill Road, Springfield, IL 62794-9276

September 23, 1996

Mr. Valdas V. Adamkus  
Regional Administrator  
USEPA Region V  
Attention: Assistance Section (MCG-10J)  
77 West Jackson Blvd  
Chicago, Illinois 60604-3590

COPY

Refer to: LPC# 1630200003  
Grant # V005982-01  
Sauget PRP Search  
Superfund Cooperative Agreement

Dear Mr. Adamkus:

The Illinois Environmental Protection Agency is hereby requesting the closeout of the Sauget PRP Search under the Enforcement Management Cooperative Agreement. The amount remaining in the Cooperative Agreement is \$0.00.

If you have any questions please contact Tim Milbrandt at the above telephone number.

Respectfully,

A handwritten signature in cursive script that reads "William C. Child".

William C. Child, Chief  
Bureau of Land

# APPLICATION FOR FEDERAL ASSISTANCE

<b>1 TYPE OF SUBMISSION</b> Application <input type="checkbox"/> Construction <input type="checkbox"/> Non Construction <input checked="" type="checkbox"/>		<b>2 DATE SUBMITTED</b> September 17, 1996	<b>Applicant Identifier</b> Saugat PRP search
<b>3 DATE RECEIVED BY STATE</b>		<b>State Application Identifier</b> 94-03-25-09	
<b>4 DATE RECEIVED BY FEDERAL AGENCY</b>		<b>Federal Identifier</b> V005982-01	

<b>5 APPLICANT INFORMATION</b> <b>Legal Name</b> IL ENVIRONMENTAL PROTECTION AGENCY <b>Address (give city, county, state and zip code)</b> P.O. Box 19276 Springfield, IL 62794-9276 Sangamon County		<b>Organizational Unit</b> Bureau of Land <b>Name and telephone number of the person to be contacted on matters involving this application (give area code)</b> Timothy Milbrandt 217 / 782-3523
<b>6 EMPLOYER IDENTIFICATION NUMBER (EIN)</b> 37 - 6002057	<b>7 TYPE OF APPLICANT (enter appropriate letter in box)</b> <b>A</b> A State <input type="checkbox"/> B County <input type="checkbox"/> C Municipal <input type="checkbox"/> D Township <input type="checkbox"/> E Interstate <input type="checkbox"/> F Intermunicipal <input type="checkbox"/> G Special District <input type="checkbox"/> H Independent School Dist <input type="checkbox"/> I State Controlled Institution of Higher Learning <input type="checkbox"/> J Private University <input type="checkbox"/> K Indian Tribe <input type="checkbox"/> L Individual <input type="checkbox"/> M Profit Organization <input type="checkbox"/> N Other (Specify) _____	
<b>8 TYPE OF APPLICATION</b> <input type="checkbox"/> New <input type="checkbox"/> Continuation <input checked="" type="checkbox"/> Revision If Revision enter appropriate letter(s) in box(es) <b>B</b> <input type="checkbox"/> A Increase Award B Decrease Award C Increase Duration D Decrease Duration Other (Specify) _____	<b>9 NAME OF FEDERAL AGENCY</b> U.S. EPA, Region V	
<b>10 CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER</b> 66-802 <b>TITLE</b> CERCLA (Superfund) P.L. 99-499 <b>17 AREAS AFFECTED BY PROJECT (CITY, COUNTY, STATE, ETC.)</b> STATE OF ILLINOIS	<b>11 DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:</b> IEPA is requesting a decrease and deobligation to the Saugat PRP Search under the Enforcement CA.	

<b>12 PROPOSED PROJECT</b> Start Date 09/27/94 Ending Date 9/30/95		<b>14 CONGRESSIONAL DISTRICTS OF:</b> a Applicant Illinois b Project Statewide																													
<b>13 ESTIMATED FUNDING</b> <table border="1"> <tr> <td>a. Federal</td> <td>\$</td> <td>21,955</td> <td>.00</td> </tr> <tr> <td>b. Applicant</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>c. State</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>d. Local</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>e. Other</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>f. Program Income</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>g. TOTAL</td> <td>\$</td> <td>21,955</td> <td>.00</td> </tr> </table>		a. Federal	\$	21,955	.00	b. Applicant	\$		.00	c. State	\$		.00	d. Local	\$		.00	e. Other	\$		.00	f. Program Income	\$		.00	g. TOTAL	\$	21,955	.00	<b>16 IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS ?</b> a. YES THIS PREAPPLICATION / APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE September 17, 1996 b. NO <input type="checkbox"/> PROGRAM IS NOT COVERED BY E.O. 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW	
a. Federal	\$	21,955	.00																												
b. Applicant	\$		.00																												
c. State	\$		.00																												
d. Local	\$		.00																												
e. Other	\$		.00																												
f. Program Income	\$		.00																												
g. TOTAL	\$	21,955	.00																												
<b>17 IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" attach an explanation																															

<b>18 TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION / PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED</b>		
<b>a Typed Name of Authorized Representative</b> Mary A. Gade	<b>b Title</b> Director	<b>c Telephone number</b> 217 / 782-3397
<b>d Signature of Authorized Representative</b> <i>Mary A. Gade</i>		<b>e Date Signed</b> 9/26/96

Previous Editions Not Usable

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Standard Form 424 Rev. 4/85  
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**APPLICATION FOR FEDERAL ASSISTANCE (Short Form)**  
**PART II - BUDGET DATA**

<u>OBJECT CLASS CATEGORIES</u>	<u>CURRENT APPROVED BUDGET</u> (a)	<u>CHANGE REQUESTED</u> (b)	<u>NEW OR REVISED BUDGET</u> (c)
1. PERSONNEL	9,938	(9,938)	0
2. FRINGE BENEFITS	2,896	(2,896)	0
3. TRAVEL	3,465	(3,465)	0
4. EQUIPMENT	0	0	0
5. SUPPLIES	100	(100)	0
6. CONTRACTUAL	150	(150)	0
7. CONSTRUCTION	0	0	0
8. OTHER	0	0	0
9. TOTAL DIRECT CHARGES	16,549	(16,549)	0
10. INDIRECT CHARGES	5,406	(5,406)	14,921
11. TOTAL	21,955	(21,955)	0
12. FEDERAL SHARE	21,955	0	21,955
13. NON-FEDERAL SHARE	0	0	0
14. PROGRAM INCOME			

**15. DETAIL ON INDIRECT COSTS:**

TYPE OF RATE (mark one box)

☐ PROVISIONAL☐ PREDETERMINED☐ FINAL☒ FIXEDRATE 39.53%BASE \$ 53,637TOTAL AMOUNT \$ 14,921

**PART II**  
**Program Narrative Statement**  
 (Attach additional sheets, if necessary)

Final budget of State Expenditures and Remaining Budget for the Saugat PRP Search.



**SAUGET AREA 1 SITES**

**SUPERFUND COOPERATIVE AGREEMENT**  
**QUARTERLY PROGRESS REPORT**

**Assistance ID Number:** V005982-01

**Site Name:** Sauget Area 1 Sites

**Activity:** Enforcement Management Assistance

**Reporting Period:** FFY1995, Q1

**I. WORK ACCOMPLISHED DURING REPORTING PERIOD**

1. IEPA received a signed multisite Cooperative Agreement (CA) on October 6 that outlined the funding amounts for enforcement assistance in pre-NPL activities at Sauget Area 1 Sites. The submittal references IEPA's March 29, 1994 CA application. This application was a modification of the one that was earlier sent to USEPA and its content was essentially the same. It included a revised schedule that reflected delays associated with funding allocation problems and delays with the start of USEPA enforcement activities. IEPA has provided a very significant amount of enforcement assistance that predated the effective date of the CA. Details of this assistance are not provided here.

2. On October 21, IEPA assisted USEPA in reviewing remaining Monsanto files in St. Louis to obtain information responsive to USEPA's 104(e) request. Monsanto provided their opinions on Site Q and Site G removal activities and stated that they agreed in principle with USEPA's intentions towards Site G.

3. IEPA attended a meeting with Monsanto and USEPA on November 21 to discuss the Action Memorandum for both Site G and Site Q. The meeting focused on technical issues involving the USEPA proposal at Site G.

4. A formal request for State ARARs applicable to USEPA's Site G Action Memorandum was received on December 12. The request was forwarded to the IEPA ARAR coordinator.

5. IEPA attended a meeting at USEPA on December 19 to discuss several technical issues regarding USEPA's proposed removal action.

6. A Monsanto counterproposal on Site G activities was received on December 20 and a conference call was held the same day with USEPA Removal, IEPA and Monsanto sharing preliminary thoughts on Monsanto's submittal. IEPA raised concerns over HDPE liners on this call and faxed general State ARARs on USEPA's proposal. IEPA

later documented these ARARs and its basic understanding of how restrictive site-specific ARARs might be in a submittal to USEPA on December 27.

## **II.A CORRECTIVE MEASURES TAKEN**

None.

## **II.B CORRECTIVE MEASURES PLANNED**

Because of delays associated with sending out 104(e) and Special Notice letters, changes are expected to occur in the overall schedule leading to negotiations.

## **III. PROJECT SCHEDULE**

Tasks	Original CA Appv'd Schd.	CA Appv'd Amended Schd.	Comp. Date
Review of Existing Information	10/94	N/A	10/94
Issuance/Review of 104(e) Letters	10/94	"	ongoing
Issuance of Special Notice Letters	1/95	"	3/95
Preparation for PRP Negotiations	10/94	"	ongoing
Negotiations with PRPs to Initiate RI/FS	3/95	"	5/95
Community Relations Support	10/94	"	ongoing

\*\*\* The "Review of Existing Information Task" was already completed and the "Issuance of Special Notice Letters Task" began before the modified CA application was sent. \*\*\*

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 9%

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 91%

EXPLANATION OF SIGNIFICANT SCHEDULING DIFFERENCES: See Section II.B

#### IV. PROJECT BUDGET

Tasks/Deliverables	CA Appv'd Budget Amt.	Est. Expendt. this Quarter	Est. Expendt. to Date
Enforcement Management Assistance	\$21,955	\$1,888	\$1,888

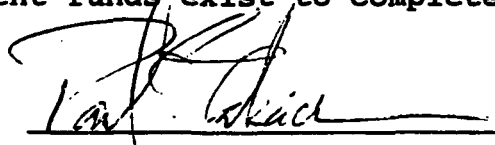
TOTAL CA: \$21,955

ACTUAL TIME AND FUNDS REMAINING: 9 months and \$20,067

EST. TIME/FUNDS NEEDED TO COMPLETE REQ'D WORK: 9 months and \$20,067

PLANNED FUNDING INCREASE REQUESTS: At the present time, it appears that sufficient funds exist to complete the project.

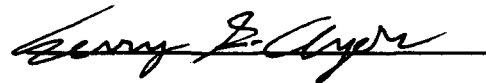
Prepared by:



Date:

13 Jan 95

Approved by:



Date:

1/27/95



**SAUGET AREA 1 SITES**

**SUPERFUND COOPERATIVE AGREEMENT**  
**QUARTERLY PROGRESS REPORT**

**Assistance ID Number:** V005982-01

**Site Name:** Sauget Area 1 Sites

**Activity:** Enforcement Management Assistance

**Reporting Period:** FFY1995, Q2

**I. WORK ACCOMPLISHED DURING REPORTING PERIOD**

1. IEPA sent a position letter to USEPA in regards to Monsanto's proposed Site G removal/remedial remedy on January 13.
2. A conference call was held on January 23 to discuss the proposed Site G remedy and its potential implications.
3. Another conference call was held on March 17 to resolve issues over the Site G remedy. It was agreed to change the proposal to encompass an interim remedy to address soil contamination only and offer Monsanto to opportunity to implement it.
4. IEPA submitted a letter to USEPA outlining potential alternatives to an Area 1 RI/FS on March 21.
5. A meeting between IEPA/USEPA and Monsanto was held on March 31 to discuss whether Monsanto was willing to implement the interim remedy. Monsanto was not willing to cooperate on this remedy, but expressed some interest in performing limited site work outside of the RI/FS process. These options included the performance of an EE/CA at Site G with or without a Consent Decree. Monsanto will contact us if any alternative is feasible.

**II.A CORRECTIVE MEASURES TAKEN**

None.

**II.B CORRECTIVE MEASURES PLANNED**

Delays associated with sending out the 104(e) and Special Notice letters have significantly impacted the overall schedule. As the majority of enforcement effort was focused on gaining an agreement with Monsanto at Site G, there doesn't appear to be a general direction in USEPA enforcement efforts after Monsanto opted out.



To limit further delays in starting the project, IEPA will make a recommendation at the RDT meeting on April 20 that will hopefully provide some insight. USEPA's input on the recommendation will be sought before the meeting. In the meantime, IEPA will continue to assist USEPA in gathering and evaluating potential PRP evidence to support an enforcement case.

### III. PROJECT SCHEDULE

Tasks	Original CA Appv'd Schd.	CA Appv'd Amended Schd.	Comp. Date
Review of Existing Information	10/94	N/A	10/94
Issuance/Review of 104(e) Letters	10/94	"	ongoing
Issuance of Special Notice Letters	1/95	"	3/95
Preparation for PRP Negotiations	10/94	"	ongoing
Negotiations with PRPs to Initiate RI/FS	3/95	"	5/95
Community Relations Support	10/94	"	ongoing

\*\*\* The "Review of Existing Information Task" was already completed and the "Issuance of Special Notice Letters Task" began before the modified CA application was sent. \*\*\*

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 26%

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 74%

EXPLANATION OF SIGNIFICANT SCHEDULING DIFFERENCES: See Section II.B

#### IV. PROJECT BUDGET

Tasks/Deliverables	CA Appv'd Budget Amt.	Est. Expendt. this Quarter	Est. Expendt. to Date
Enforcement Management Assistance	\$21,955	\$3,884	\$5,772

TOTAL CA: \$21,955

ACTUAL TIME AND FUNDS REMAINING: 6 months and \$16,183

EST. TIME/FUNDS NEEDED TO COMPLETE REQ'D WORK: 6 months and \$16,183

PLANNED FUNDING INCREASE REQUESTS: At the present time, it appears that sufficient funds exist to complete the project.

Prepared by:

*Paul L. Leticia*

Date:

14 Apr 75

Approved by:

*Henry B. Payne*

Date:

4/24/75



Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

SAUGET AREA 1 SITES

SUPERFUND COOPERATIVE AGREEMENT  
QUARTERLY PROGRESS REPORT

Assistance ID Number: V005982-01

Site Name: Sauget Area 1 Sites

Activity: Enforcement Management Assistance

Reporting Period: FFY1995, Q3

**I. WORK ACCOMPLISHED DURING THIS REPORTING PERIOD**

1. Throughout the reporting period (April 1 through June 30) IEPA made ten visits to Site G to assist in evidence recovery and to provide general assistance in USEPA's removal project to place an interim cap on Site G. Included in these visits were several meetings at the site to discuss overall project issues.

2. IEPA submitted a draft RDT proposal for USEPA review on April 13. No comments were received.

3. An RDT meeting was held on April 20 to resolve issues of federal/state management of the Sauget Sites. The RDT recommended that a management plan be developed for the Sauget Sites. The RDT agreed that additional state and federal technical expertise would move to resolve many issues that existed between the agencies and that \$750,000 would be made available to IEPA for personnel and contractor assistance throughout the development of this "Sauget Sites Management Plan". The RDT also recommended that communications with potential Sauget Sites PRPs cease until a unified IEPA/USEPA position on project expectations could be presented to a future Sauget Sites PRP group. IEPA prepared a summary of the findings of the RDT and USEPA/ORC provided comments that were incorporated into a final RDT summary.

4. IEPA attended a meeting with USEPA/ORC and USEPA's PRP investigation group on May 17 to discuss information obtained from the ongoing 104(e) process.

5. IEPA submitted a CA application and scope outlining RDT-recommended work as requested by USEPA on May 17. Per USEPA's direction, an amended Scope of Work was submitted on June 17 to reflect a "State lead Remedial Investigation/Feasibility Study" at the Sauget Area 1 Sites.

## II.A CORRECTIVE MEASURES TAKEN

A substantial number of site visits to Sauget, unforeseen work on a CA application and subsequent CA scope modification have seriously impacted the Enforcement Assistance CA budget. As a result, out-of-scope activities were curtailed beginning before the end of the reporting quarter.

## II.B CORRECTIVE MEASURES PLANNED

As a large portion of work completed in this quarter does not correlate with the Enforcement Assistance Scope of Work, IEPA will continue to limit its involvement in out-of-scope CA activities. IEPA may request a funding increase and scope modification in this current Enforcement Assistance CA to assure completion of IEPA's assistance with USEPA/ORC in the PRP identification process.

Significant delays in the organization of the "Sauget Sites Management Plan Development Group" will cause delays in formulating the IEPA/USEPA position on project expectations to the yet-to-be defined PRP group.

The \$750,000 funding promised by the RDT and recently canceled will seriously impact the overall progress to be made in the management planning group. To date, there is little available funding for the state's participation in the management planning group. A separate CA and scope to cover these activities may be prepared and submitted to USEPA if funding is not made available soon.

## III. PROJECT SCHEDULE

Tasks	Original CA Appv'd Schd.	CA Appv'd Amended Schd.	Comp. Date
Review of Existing Information	10/94	N/A	10/94
Issuance/Review of 104(e) Letters	10/94	"	ongoing
Issuance of Special Notice Letters	1/95	"	9/95
Preparation for PRP Negotiations	10/94	"	ongoing
Negotiations with PRPs to Initiate RI/FS	3/95	"	11/95
Community Relations Support	10/94	"	ongoing

\*\*\* The "Review of Existing Information Task" was already completed and the "Issuance of Special Notice Letters Task" began before the modified CA application was sent. \*\*\*

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 74%

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 26%

EXPLANATION OF SIGNIFICANT SCHEDULING DIFFERENCES: See Section II.B

#### IV. PROJECT BUDGET

Tasks/Deliverables	CA Appv'd Budget Amt.	Est. Expendt. this Quarter	Est. Expendt. to Date
Enforcement Management Assistance	\$21,955	\$10,463	\$16,235

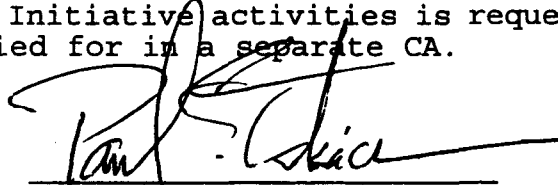
TOTAL CA: \$21,955

ACTUAL TIME AND FUNDS REMAINING: 3 months and \$5,720

EST. TIME/FUNDS NEEDED TO COMPLETE REQ'D WORK: 5 months and \$5,720

PLANNED FUNDING INCREASE REQUESTS: At the present time, it appears that insufficient funds exist to complete enforcement assistance activities in this project. If IEPA's continued involvement in Gateway Initiative activities is requested additional funding will be applied for in a separate CA.

Prepared by:



Date:

25 Jul 95

Approved by:



Date:

7/28/95



Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

**SAUGET AREA 1 SITES**

**SUPERFUND COOPERATIVE AGREEMENT**  
**QUARTERLY PROGRESS REPORT**

Assistance ID Number: V005982-01

Site Name: Sauget Area 1 Sites

Activity: Enforcement Management Assistance

Reporting Period: FFY1995, Q4

**I. WORK ACCOMPLISHED DURING THIS REPORTING PERIOD**

1. IEPA made a site visit to Site G on July 6, 1995. Evidence obtained in USEPA's removal project and future work to be performed mainly at the Dead Creek segments were discussed.
2. IEPA submitted a position paper to USEPA on August 4 outlining concerns over negotiation strategies.
3. A meeting was held at USEPA on August 29 to discuss enforcement issues and how they relate to Gateway Initiative issues.
4. A site visit/meeting was held at Area 1 on September 6. Potential investigative approaches that might be employed in a Dead Creek cleanup were discussed with Sam Bories.
5. IEPA met with representatives of USEPA's Gateway Initiative team on September 12 to discuss Initiative options that could be helpful in the overall Sauget Sites strategy.

**II.A CORRECTIVE MEASURES TAKEN**

None.

**II.B CORRECTIVE MEASURES PLANNED**

It is anticipated that a time extension for the enforcement CA will be applied for. Funding in this CA will likely run out in the next reporting quarter.

### III. PROJECT SCHEDULE

Tasks	Original CA Appv'd Schd.	CA Appv'd Amended Schd.	Comp. Date
Review of Existing Information	10/94	N/A	10/94
Issuance/Review of 104(e) Letters	10/94	"	ongoing
Issuance of Special Notice Letters	1/95	"	12/95
Preparation for PRP Negotiations	10/94	"	ongoing
Negotiations with PRPs to Initiate RI/FS	3/95	"	1/96
Community Relations Support	10/94	"	ongoing

\*\*\* The "Review of Existing Information Task" was already completed and the "Issuance of Special Notice Letters Task" began before the modified CA application was sent. \*\*\*

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 95%

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 5%

EXPLANATION OF SIGNIFICANT SCHEDULING DIFFERENCES: See Section II.B

### IV. PROJECT BUDGET

Tasks/Deliverables	CA Appv'd Budget Amt.	Est. Expendt. this Quarter	Est. Expendt. to Date
Enforcement Management Assistance	\$21,955		

TOTAL CA: \$21,955

ACTUAL TIME AND FUNDS REMAINING: 12 months and

EST. TIME/FUNDS NEEDED TO COMPLETE REQ'D WORK: 3 months and

PLANNED FUNDING INCREASE REQUESTS: At the present time, it appears that insufficient funds exist to complete enforcement assistance activities in this project. If IEPA's continued involvement in Gateway Initiative activities is requested, additional funding will be applied for in a separate CA.

Prepared by:

Paul K. Calkins

Date:

26 Oct 95

Approved by:

Henry Blaylock

Date:

12/30/95

Note: CA expenditure figures were not available at the time this quarterly report was prepared.





162243

11/2/94  
(5-30001)

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

**SAUGET AREA 1 SITES**

**SUPERFUND COOPERATIVE AGREEMENT**  
**QUARTERLY PROGRESS REPORT**

**Assistance ID Number:** V005982-01

**Site Name:** Sauget Area 1 Sites

**Activity:** Enforcement Management Assistance

**Reporting Period:** FFY1995, Q4

**I. WORK ACCOMPLISHED DURING REPORTING PERIOD**

1. IEPA received a signed multisite Cooperative Agreement (CA) on October 6 that outlined the funding amounts for enforcement assistance in pre-NPL activities at Sauget Area 1 Sites. The submittal references IEPA's March 29, 1994 CA application. This application was a modification of the one that was earlier sent to USEPA and its content was essentially the same. It included a revised schedule that reflected delays associated with funding allocation problems and delays with the start of USEPA enforcement activities. IEPA has provided a very significant amount of enforcement assistance that predated the effective date of the CA. Details of this assistance are not provided here.

2. On October 21, IEPA assisted USEPA in reviewing remaining Monsanto files in St. Louis to obtain information responsive to USEPA's 104(e) request. Monsanto provided their opinions on Site Q and Site G removal activities and stated that they agreed in principle with USEPA's intentions towards Site G.

3. IEPA attended a meeting with Monsanto and USEPA on November 21 to discuss the Action Memorandum for both Site G and Site Q. The meeting focused on technical issues involving the USEPA proposal at Site G.

4. A formal request for State ARARs applicable to USEPA's Site G Action Memorandum was received on December 12. The request was forwarded to the IEPA ARAR coordinator.

5. IEPA attended a meeting at USEPA on December 19 to discuss several technical issues regarding USEPA's proposed removal action.

6. A Monsanto counterproposal on Site G activities was received on December 20 and a conference call was held the same day with USEPA Removal, IEPA and Monsanto sharing preliminary thoughts on Monsanto's submittal. IEPA raised concerns over HDPE liners on this call and faxed general State ARARs on USEPA's proposal. IEPA

later documented these ARARs and its basic understanding of how restrictive site-specific ARARs might be in a submittal to USEPA on December 27.

#### II.A CORRECTIVE MEASURES TAKEN

None.

#### II.B CORRECTIVE MEASURES PLANNED

Because of delays associated with sending out 104(e) and Special Notice letters, changes are expected to occur in the overall schedule leading to negotiations.

#### III. PROJECT SCHEDULE

Tasks	Original CA Appv'd Schd.	CA Appv'd Amended Schd.	Comp. Date
Review of Existing Information	10/94	N/A	10/94
Issuance/Review of 104(e) Letters	10/94	"	ongoing
Issuance of Special Notice Letters	1/95	"	3/95
Preparation for PRP Negotiations	10/94	"	ongoing
Negotiations with PRPs to Initiate RI/FS	3/95	"	5/95
Community Relations Support	10/94	"	ongoing

\*\*\* The "Review of Existing Information Task" was already completed and the "Issuance of Special Notice Letters Task" began before the modified CA application was sent. \*\*\*

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 9%

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 91%

EXPLANATION OF SIGNIFICANT SCHEDULING DIFFERENCES: See Section II.B

#### IV. PROJECT BUDGET

Tasks/Deliverables	CA Appv'd Budget Amt.	Est. Expendt. this Quarter	Est. Expendt. to Date
Enforcement Management Assistance	\$21,955	\$1,888	\$1,888

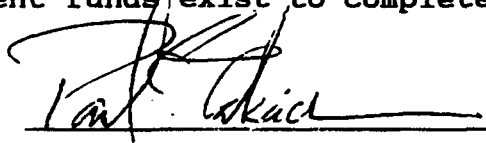
TOTAL CA: \$21,955

ACTUAL TIME AND FUNDS REMAINING: 9 months and \$20,067

EST. TIME/FUNDS NEEDED TO COMPLETE REQ'D WORK: 9 months and \$20,067

PLANNED FUNDING INCREASE REQUESTS: At the present time, it appears that sufficient funds exist to complete the project.

Prepared by:



Date:

13 Jan 95

Approved by:



Date:

1/27/95



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-3912

Refer to: L1630200005 -- St. Clair County  
Sauget Sites (Area 1) -- Sauget  
Superfund/Technical Reports

December 27, 1994

Mr. Samuel F. Borries  
On-Scene Coordinator  
USEPA-Region V, HSE-5J  
77 West Jackson Blvd.  
Chicago, Illinois 60604-3590

Dear Sam:

This is in reference to your December 8 written request to IEPA for ARARs governing the upcoming proposed removal action at Site G. I've identified the general ARARs noted in the attachment as being applicable both to USEPA's and Monsanto's proposals for Site G. These ARARs are the same ones that I faxed to you before our conference call with Monsanto on December 20 and although they are general in nature, I hope to have site-specific ARARs available for you by mid to late January.

Preliminary conversations with my reviewers have indicated that if this removal action is going to be considered an "interim" action (which I believe to be the case), site-specific ARARs may not be as stringent as USEPA and Monsanto have been led to believe. I will hopefully have more to say on this shortly.

If you have questions or concerns relating to this letter, please give me a call.

Sincerely,

Paul E. Takács, Project Manager  
National Priorities List Unit  
Division of Remediation Management  
Bureau of Land

Attachment - General ARARs

cc: Terry Ayers (w/o attachment)  
Kim Hubbert (w/o attachment)  
Jeff Gore, USEPA  
Division File

## APPENDIX A

### APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS <sup>a/</sup>

#### 1. Office of Solid Waste

- Resource Conservation and Recovery Act of 1976 (42 U.S.C. 6901) <sup>b/</sup>
  - a. 40 CFR Part 264, applicable for permitted facilities <sup>c/</sup>, and 40 CFR Part 265, for interim status facilities.
    - Groundwater Protection (40 CFR 264.90-264.101)
    - Groundwater Monitoring, Subpart F (40 CFR 264.98-264.100) <sup>d/</sup>
    - Closure and Post-Closure (40 CFR 264.110-264.120, 265.110-265.120)
    - Containers (40 CFR 264.170-264.178, 265.190-265.177)
    - Tanks (40 CFR 264.190-264.200, 265.190-265.199)
    - Surface Impoundments (40 CFR 264.220-264.249, 265.220-265.230)
    - Waste Piles (40 CFR 264.250-264.269, 265.250-265.258)
    - Land Treatment (40 CFR 264.270-264.299, 265.270-265.282)
    - Incinerators (40 CFR 264.340-264.999, 265.340-265.369)
    - Land Disposal Restrictions (40 CFR 268.1-268.50)
  - b. 40 CFR Part 280, Underground Storage Tank Regulations
  - c. Statutory requirements, including:
    - Liquids in Landfills (RCRA §3004(c))
    - Minimum Technology Requirements (RCRA §3004(o), 3005(j))
    - Dust Suppression (RCRA §3004(e))
    - Hazardous Waste Used as Fuel (RCRA §3004(q))
  - d. Open Dump Criteria - pursuant to RCRA Subtitle D: criteria for classification of solid waste disposal facilities (40 CFR Part 257). Note: For nonhazardous wastes.

#### 2. Office of Water

- The Safe Drinking Water Act (42 U.S.C. 300(f))
  - a. Maximum Contaminant Levels (chemicals, turbidity, and microbiological contamination) (for drinking water or human consumption) (40 CFR 141.11-141.16).
  - b. Maximum Contaminant Level Goals (40 CFR 141.50-141.51, 50 FR 46936).

## APPENDIX A

## APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS g/

- Clean Water Act (33 U.S.C. 1251)  
Requirements established pursuant to sections 301 (effluent limitations), 302 (effluent limitations), 303 (water quality standards, including State water quality standards), 304 (Federal water quality criteria), 306 (national performance standards), 307 (toxic and pretreatment standards, including Federal pretreatment standards for discharge into publicly owned treatment works, and numeric standards for toxics), 402 (national pollutant discharge elimination system), 403 (ocean discharge criteria), and 404 (dredged or fill material) of the Clean Water Act, (33 CFR Parts 320-330, 40 CFR Parts 122, 123, 125, 131, 230, 231, 233, 400-469). Available ambient Water Quality Criteria Documents are listed at 45 FR 79318, November 28, 1980; 49 FR 5831, February 15, 1984; 50 FR 30784, July 29, 1985; 51 FR 22978, June 28, 1986; 51 FR 43665, December 3, 1986; 51 FR 8012, March 7, 1986; 52 FR 6213, March 2, 1987.

- EPA's Statement of Procedures on Floodplains Management and Wetlands Protection, (40 CFR Part 6 Appendix A) g/

3. Office of Air and Radiation

- Clean Air Act (42 U.S.C. 7401)
  - a. National Emissions Standards for Hazardous Air Pollutants for Asbestos and Wet Dust particulates, (40 CFR 61.140-61.156), and for other hazardous substances (40 CFR Part 61 generally). See also effluent limitations and pretreatment standards for Wet Dust Collection (40 CFR 427.110-427.116) and 40 CFR Part 763.
  - b. Standards of performance for new stationary sources, including new incinerators (42 U.S.C. 7411), (40 CFR Part 60).

4. Other Federal Requirements

- OSHA requirements for workers engaged in response or other hazardous waste operations (29 CFR 1910.120).
- Occupational Safety and Health Act of 1970 (29 U.S.C. 651).
  - a. Occupational Safety and Health Standards (General Industry Standards) (29 CFR Part 1910).
  - b. The Safety and Health Standards for Federal Service Contracts (29 CFR Part 1926).
  - c. The Health and Safety Standards for Employees engaged in Hazardous Waste Operations. (50 FR 45654).
- Department of Transportation Rules for the Transportation of Hazardous Materials, 49 CFR Parts 107, 171.1-172.558.
- Endangered Species Act of 1973, 16 U.S.C. 1531. (Generally, 50 CFR Parts 81, 225, 402).
- Wild and Scenic Rivers Act, 16 U.S.C. 1271.
- Fish and Wildlife Coordination Act, 16 U.S.C. 661 note.
- Fish and Wildlife Improvement Act of 1978, and Fish and Wildlife Act of 1956, 16 U.S.C. 742a note.
- Fish and Wildlife Conservation Act of 1980, 16 U.S.C. 2901. (Generally, 50 CFR Part 83).

## APPENDIX A

### APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS a/

#### 4. Other Federal Requirements (Cont.)

- Farmland Protection Policy Act, 7 U.S.C. 4201. (Generally, 7 CFR Part 658).
- Rivers and Harbors Act (33 U.S.C. 403).

#### 5. State Requirements

- Title 35: Env. Prot. Act Subtitle B:

##### a. Air Pollution Chapter T: Subchapter C:

- 35 IAC 212.121-125,
- 35 IAC 212.421

##### b. Air Pollution Subchapter A:

- 35 IAC 201.151

##### c. Air Pollution Subparagraph A: Permits

- 35 IAC 201.141-144,
- 35 IAC 201.146-147,
- 35 IAC 201.149,
- 35 IAC 201.12-165,
- 35 IAC 201.207-210,
- 35 IAC 201.261-265,
- 35 IAC 201.282-283,
- 35 IAC 201.301-302

##### d. Air Pollution Subchapter C, Emissions Stds. and Limitations for Stationary Sources

- 35 IAC 212.110,
- 35 IAC 212.181-185
- 35 IAC 212.302,
- 35 IAC 212.304-310,
- 35 IAC 212.312-315,
- 35 IAC 212.321-323,
- 35 IAC 212.361,
- 35 IAC 212.381,
- 35 IAC 212.422,
- 35 IAC 212.441,
- 35 IAC 212.455-457,
- 35 IAC 212.461-463,
- 35 IAC 212.681,
- 35 IAC 215.101-102,

# APPENDIX A

## APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS a/

- Title 35: Env. Prot. Act Subtitle B: (Cont.)
  - d. Air Pollution Subchapter C, Emissions Sids and Limitations for Stationary Sources (Cont.
    - 35 IAC 215.121-122,
    - 35 IAC 215.141.144,
    - 35 IAC 215.301-304,
    - 35 IAC 215.500,
    - 35 IAC 215.541,
    - 35 IAC 215.562,
    - 35 IAC 231.110,
    - 35 IAC 231.122,
    - 35 IAC 231.130,
    - 35 IAC 231.140,
    - 35 IAC 231.150,
    - 35 IAC 231.160,
    - 35 IAC 231.180,
    - 35 IAC 231.190,
    - 35 IAC 231.200,
    - 35 IAC 231.210,
    - 35 IAC 231.230,
    - 35 IAC 231.240,
    - 35 IAC 231.250,
    - 35 IAC 231.260,
    - 35 IAC 231.320,
    - 35 IAC 309.1.1-191
  - e. Air Pollution Subchapter K:
    - 35 IAC 240.103-104,
    - 35 IAC 240.121
    - 35 IAC 243.104-108,
    - 35 IAC 243.121-126
- Title 35: Env. Prot. Subtitle C:
  - a. Water Pollution Subpart B: General Use Water Quality Standards
    - 35 IAC 302.208
    - 35 IAC 302.210
    - 35 IAC 304.120-126,
    - 35 IAC 304.201-206,

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## APPENDIX A

### APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS g/

- Title 35: Env. Prot. Subtitle C: (Cont.)
  - a. Water Pollution Subpart B: General Use Water Quality Standards (Cont.)
    - 35 IAC 304.301,
    - 35 IAC 306.201,
    - 35 IAC 306.302-306,
    - 35 IAC 306.401-406,
    - 35 IAC 309.201-282
  - b. Water Pollution Subpart C: Public and Food Processing Water Supply Standards
    - 35 IAC 302.304
    - 35 IAC 304.102-106,
    - 35 IAC 304.141,
    - 35 IAC 305.102-103,
    - 35 IAC 305.306,
    - 35 IAC 305.102,
    - 35 IAC 307.101-105
- Title 35: Env. Prot. Subtitle F:
  - a. Public Water Supplies Subpart B:
    - Chemical and Physical Quality 35 IAC 604.202
    - Public Water Supplies 35 IAC 604.203-204, 605.103
- Title 35 Env. Prot. Act Subtitle G:
  - a. Waste Disposal C:
    - 35 IAC 700.101-304,
    - 35 IAC 702.101-187,
    - 35 IAC 703.101-246,
    - 35 IAC 704.101-203,
    - 35 IAC 705.121-212,
    - 35 IAC 720.101-122,
    - 35 IAC 721.101-133,
    - 35 IAC 722.110-131,
    - 35 IAC 724.101-451,
    - 35 IAC 725.101-530,
    - 35 IAC 726.120-180,
    - 35 IAC 730.101-152 Dept. of Mines and Minerals Rule IIA,
    - 35 IAC 809.101-802,
    - 35 IAC 811

# APPENDIX A

## APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS a/

- Title 35 Env. Prot. Act Subtitle G: (Cont.)
  - b. Sanitary Landfills Subpart E: Closure and Postclosure
    - 35 IAC 807.301-315,
    - 35 IAC 807.318,
    - 35 IAC 807.501-524,
    - 35 IAC 807.600-666
- Title 35 Env. Prot. Act Subtitle H:
  - a. Noise
    - 35 IAC 902.101,
    - 35 IAC 902.102,
    - 35 IAC 902.120-125,
    - 35 IAC 902.140-141
- Title 92 IL Adm. Code, Transportation Subchapter C:
  - a. Haz. Mat.
    - 92 IAC 171.1-317,
    - 92 IAC 172.1000-2215,
    - 92 IAC 173.2000-3000
- Illinois Water Well Construction Code Law  
(Ill. Rev. Stat. 1987 Ch. 111 1/2, pars. 116, 111-118, as amended)
- Illinois Water Well and Pump Installation Contractors Licensing Act  
(Ill. Rev. Stat. 1987 Ch. 111, pars. 7101-7130, as amended).
- PA 85-1195 Part I:  
Hazardous Waste Crane and Hoisting Equipment Operators Licensing Act (S.H.A. Ch. 11, par. 7701 et seq., as amended)
- I.D.O.T.  
Dir. of Highways  
Sec. 15 Ill. Vehicle Code Based on Federal Bridge Formulas
- State Field Sampling Procedures

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## APPENDIX A

## APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS g/

## OTHER FEDERAL AND STATE CRITERIA, ADVISORIES, AND GUIDANCE TO BE CONSIDERED g/

1. Federal Criteria, Advisories, and Procedures

- Health Effects Assessments (HEAs) and Proposed HEAs, ("Health Effects Assessment for (Specific Chemicals)," ECAO, USEPA, 1985).
- Reference Doses (RfDs), ("Verified Reference Doses of USEPA," ECAO-CIN 475, January 1986). See also Drinking Water Equivalent Levels (DWELs), a set of medium-specific drinking water levels derived from RfDs. (See USEPA Health Advisories, Office of Drinking Water, March 31, 1987).
- Carcinogen Potency Factors (CPFs) (e.g., Q1 Stars, Carcinogen Assessment Group [CAG] Values), (Table 11, "Health Assessment Document for Tetrachloroethylene (Perchloroethylene)," USEPA, OHEA/6008 82/005F, July 1985).
- Waste load allocation procedures, EPA Office of Water (40 CFR Part 125, 130).
- Federal Sole Source Aquifer requirements (see 52 FR 6873, March 5, 1987).
- Public health criteria on which the decision to list pollutants as hazardous under Section 112 of the Clean Air Act was based.
- Guidelines for Groundwater Classification under the EPA Groundwater Protection Strategy.
- Advisories issued by PWS and NWPS under the Fish and Wildlife Coordination Act.
- OSHA health and safety standards that may be used to protect public health (non-workplace).
- Health Advisories, EPA Office of Water.
- EPA Water Quality Advisories, EPA Office of Water, Criteria and Standards Division.

2. USEPA RCRA Guidance Documents

- Interim Final Alternate Concentration Limit Guidance Part I: ACL Policy and Information Requirements (July, 1987)
  - a. EPA's RCRA Design Guidelines
  - b. Permitting Guidance Manuals
  - c. Technical Resource Documents (TRDs)
  - d. Test Methods for Evaluating Solid Waste

3. USEPA Office of Water Guidance Documents

- a. Pretreatment Guidance Documents
- b. Water Quality Guidance Documents
- c. NPDES Guidance Documents
- d. Groundwater/UIC Guidance Documents
- e. Groundwater Protection Strategy (August 1984).
- f. Clean Water Act Guidance Documents

## APPENDIX A

APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS <sup>a/</sup>OTHER FEDERAL AND STATE CRITERIA, ADVISORIES, AND GUIDANCE TO BE CONSIDERED <sup>a/</sup>

4. EUSEPA Manuals from the Office of Research and Development
  - SW 846 methods - laboratory analytic methods (November 1986)
  - Lab protocols developed pursuant to Clean Water Act Section 304(h).
5. Nonpromulgated State Advisories
  - State approval of water supply system additions or developments.
  - State groundwater withdrawal approvals.
  - Superfund program groundwater cleanup goals
  - Recommended allowable drinking water limits
  - $10^{-5}$  risk level

Source: EPA CERCLA COMPLIANCE WITH OTHER LAWS MANUAL; May 6, 1988 (OSWER Directive 9234.1-01).

- <sup>a/</sup> This is the list of potentially applicable or relevant and appropriate requirements found in the October 2, 1985, Compliance Policy with additions. As additional requirements are promulgated, they will be considered potentially applicable or relevant and appropriate and added to this list.
- <sup>b/</sup> In authorized States, Federal regulations promulgated under RCRA are not applicable as a State requirement until the State adopts those regulations through its own legislative process, but probably would be relevant and appropriate as a federal requirement. Federal regulations promulgated pursuant to the Hazardous and Solid Waste Amendments of 1984, however, are effective immediately in all 50 states, and are potentially applicable as Federal requirements.
- <sup>c/</sup> 40 CFR Part 264 regulations apply to permitted facilities and may be relevant and appropriate to other facilities.
- <sup>d/</sup> Only Subpart F groundwater monitoring requirements under 40 CFR 264 are ARAR. The Subpart F groundwater monitoring requirements under 40 CFR 265 are not ARAR.
- <sup>e/</sup> 40 CFR Part 6 Subpart A sets forth EPA policy for carrying out the provisions of Executive Orders 11988 (Floodplains Management) and 11990 (Protection of Wetlands).